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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
MOTION TO STRIKE VAGUE AND
OVERBROAD TRADE SECRET CLAIMS
AND EMERGENCY MOTION FOR
EXPEDITED BRIEFING AND HEARING
AND EXHIBITS THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
7 Ottomotto, LLC's Administrative Motion to File Under Seal Portions of Their Motion to Strike Vague
8 and Overbroad Trade Secrets and Emergency Motion for Expedited Briefing and Hearing and Exhibits
9 Thereto (the "Administrative Motion"). The Administrative Motion seeks an order sealing
10 highlighted portions of Uber's Motion to Strike Vague and Overbroad Trade Secret Claims and
11 Emergency Motion for Expedited Briefing and Hearing ("Uber's Motion"), of the Declaration of
12 Esther Chang, and of Exhibits 12-13 to the Declaration of Esther Chang ("Exhibits 12-13"), as well as
13 the entirety of Exhibits 2-7 and 14-16 to the Declaration of Esther Chang ("Exhibits 2-7 and 14-16")
14 and Exhibit 1 to the Declaration of Rudy Kim ("Kim Exhibit 1").

15 3. The portions of Uber's Motion marked in red boxes, the green highlighted portions of
16 the Declaration of Esther Chang, of Exhibits 3, 12-13, and 15-16 thereto and of Kim Exhibit 1, and the
17 entirety of Exhibits 2, 4-7, and 14 contain or refer to trade secret information, which Waymo seeks to
18 seal.

19 4. Uber's Motion (portions marked in red boxes in version filed herewith), the
20 Declaration of Esther Chang (green highlighted portions), Exhibit 2 (entire document), Exhibit 3
21 (green highlighted portions in version filed herewith), Exhibits 4-7 (entire documents), Exhibits 12-13
22 (green highlighted portions), Exhibit 14 (entire document), Exhibits 15-16 (green highlighted portions
23 in version filed herewith), and Kim Exhibit 1 (green highlighted portions in version filed herewith)
24 contain, reference, and/or describe Waymo's asserted trade secrets. The information Waymo seeks to
25 seal includes the confidential design and functionality of Waymo's proprietary autonomous vehicle
26 system, including its LiDAR designs, which Waymo maintains as secret. I understand that these trade
27 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to
28 Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's

1 competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle
2 system. If such information were made public, I understand that Waymo's competitive standing
3 would be significantly harmed.

4 5. Waymo's request to seal is narrowly tailored to those portions of Uber's Motion, the
5 Declaration of Esther Chang, Exhibits 2-7 and 12-16 thereto, and Kim Exhibit 1 that merit sealing.

6
7 I declare under penalty of perjury under the laws of the State of California and the United
8 States of America that the foregoing is true and correct, and that this declaration was executed in San
9 Francisco, California, on August 11, 2017.

10 By /s/ Felipe Corredor

11 Felipe Corredor

12 Attorneys for WAYMO LLC

13
14 **ATTESTATION**

15 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
16 document has been obtained from Felipe Corredor.

17
18 By: /s/ Charles K. Verhoeven

19 Charles K. Verhoeven